

**GREGORY L. SILVERMAN, ESQ., P.C.**

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January 29, 2024

**VIA CM/ECF ONLY**

Hon. Mark W. Pedersen  
100 State Street  
Rochester, NY 14614  
pedersen@nywd.uscourts.gov

**RE: Jason Wemes v. The Canandaigua National Bank & Trust Company;  
Case No.: 6:22-cv-06297 (DGL) (MWP)**

**SUBJECT: Consent Request for Adjournment of Discovery Deadlines**

Dear Magistrate Judge Pedersen:

I write on behalf of Plaintiff Jason Wemes, with the consent of counsel for Defendant, to request an enlargement of time to complete discovery. The parties have propounded and responded to written discovery. The Court has accepted personnel files of two of Defendant's employees for *in camera* review, and will determine what documents, if any, are discoverable (Dkt. 18).

Two prior extensions of time have been granted. The parties seek to extend the various deadlines in the Amended Scheduling Order set forth on October 5, 2023 by six (6) months as follows:

<b>Deadline</b>	<b>Current date</b>	<b>Proposed date</b>
Factual discovery	February 2, 2024	<b>August 2, 2024</b>
Motions to compel discovery	March 1, 2024	<b>September 2, 2024</b>
Motions to join other parties and to amend the pleadings	March 8, 2024	<b>September 6, 2024</b>
Plaintiff's identification of expert witnesses and provision of reports	April 5, 2024	<b>October 4, 2024</b>
Defendant's identification of expert witnesses and provision of reports	May 3, 2024	<b>November 1, 2024</b>
Plaintiff's identification of rebuttal experts and provision of reports	June 7, 2024	<b>December 6, 2024</b>
All discovery relating to experts, including depositions	July 3, 2024	<b>January 3, 2025</b>
Dispositive motions	September 6, 2024	<b>February 28, 2025</b>

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Thank you for your consideration of this request.

Sincerely,

A handwritten signature in black ink, appearing to read 'G. Silverman', with a stylized flourish extending to the right.

Gregory L. Silverman